



Kowa American Corporation

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[June 3rd, 2014]

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TSCA Confidential Business Information Center (7407M)
WJC East - Room 6428
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302

Attn.: TSCA Section 8(e)

Re: **TSCA Section 8(e) Submission of Information Pertaining to:**

**2-Propenoic acid, 2-methyl-, (tetrahydro-2-furanyl)methyl ester
CAS RN 2455-24-5**

Dear Sir/Madam:

Kowa American Corporation (Kowa American or the Company) formally submits the enclosed information to the U.S. Environmental Protection Agency (EPA or the Agency) under Section 8(e) of the Toxic Substances Control Act (TSCA) for the following chemical substance:

CA Index Name: 2-Propenoic acid, 2-methyl-, (tetrahydro-2-furanyl)methyl ester

CAS Registry Number: 2455-24-5

Common Name: Tetrahydrofurfuryl methacrylate (THFMA)

This information is being promptly submitted to EPA to ensure that the Agency's Administrator is adequately informed of the results of overseas testing conducted by the Higher Methacrylate REACH Task Force (HMRTF) on the above identified chemical substance. Specifically, this testing pertains to a combined repeated dose toxicity study

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with the reproduction/developmental toxicity screening test conducted under OECD Test Guideline 422. This study was sponsored by the HMRTF.

Kowa American is an importer of tetrahydrofurfuryl methacrylate. However, the Company is not a member of the HMRTF and, as a result, therefore, has no access or rights to the data contained in the above test study. The only information in the Company's possession is the enclosed letter containing the TSCA For Your Information (FYI) submission recently made by the HMRTF. Based on the information contained in the HMRTF's letter, Kowa American is submitting this information as a formal TSCA Section 8(e) submission.

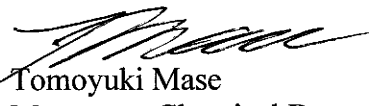
The Company has not made a determination as to whether a significant risk of injury to human health or the environment is actually presented by these findings. Rather, this information is submitted in order to ensure that the EPA Administrator is adequately informed of such information.

EPA will note that Kowa American is not claiming any information in this TSCA Section 8(e) submission as Confidential Business Information.

* * *

If there are any questions regarding this submission, please contact Mr. John V. Massingale of Greenwich Chemical Consulting, Inc. He is reachable at (561) 578-8110. Thank you for your consideration in this matter.

Sincerely,



Tomoyuki Mase
Manager – Chemical Department

Enclosure: HMRTF FYI Letter to EPA

cc: Greenwich Chemical Consulting, Inc.

Enclosure

HIGHER METHACRYLATE REACH TASK FORCE
17260 VANNES COURT, HAMILTON, VA 20158
Office (540) 751-2093 ■ Fax (540) 751-2094 ■ e.hunt@comcast.net

May 9, 2014

TSCA Confidential Business Information Center (7407M)
WCJ East- Room 6428 Attn: FYI
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Re: Tetrahydrofurfuryl Methacrylate, CAS: 2455-24-5 "For Your Information"
CONTAINS NO CONFIDENTIAL BUSINESS INFORMATION

Dear Sir/Madam:

The following information is being submitted by the Higher Methacrylate REACH Task Force (HMRTF) on behalf of its member companies (Mitsubishi Rayon Corporation, and Evonik Industries AG) as a "For Your Information" Submission in conformance with the TSCA Section 8(e) guidance published by the US EPA (<http://www.epa.gov/oppt/tsca8e/>). The Task Force has considered the reasonably foreseeable exposures for this chemical and has concluded that the uses do not present a significant risk of injury to health or to the environment.

The Higher Methacrylate REACH Task Force is submitting results of a Combined Repeated Dose Toxicity Study with the Reproduction/Developmental Toxicity Screening Test (OECD 422) in Sprague Dawley rats. The test substance, Tetrahydrofurfuryl Methacrylate, is an industrial chemical.

The study was carried out according to the requirements of the following guidelines:

- EPA Health Effects Test Guidelines, OPPTS 870.3650 Combined Repeated Dose Toxicity Study With the Reproduction/ Developmental Toxicity Screening Test (July 2000)
- OECD Guideline for Testing of Chemicals, Combined Repeated Dose Toxicity Study with the Reproduction/Developmental Toxicity Screening Test (22 Mar 1996)

The test substance was administered by gavage. The test item, suspended in corn oil, was administered by oral gavage to 3 groups of 10 males and 10 females at doses of 50, 120, and 300 mg/kg body weight/day. Males were treated for a total of 29 days, including 2 weeks prior to pairing and continuously thereafter; up to the day before necropsy. Females were dosed throughout the study including 2 weeks before pairing, and thereafter during pairing, gestation and lactation periods until the day of necropsy or Day 3 postpartum for females with live pups at Day 4 postpartum.

The following is a summary of the most relevant results:

In the high dose group (300 mg/kg/day), 3 females had total resorption and 7 females had total litter loss within 1 day of parturition. The number of females with live pups on Day 4 postpartum was: 6 in the control, 10 in the low dose (50 mg/kg/day) and 9 in the mid-dose (120 mg/kg/day) group.

On the basis of the results obtained in the study, the No Observed Adverse Effect Level (NOAEL) for systemic toxicity was considered 300 mg/kg bw/day for males and females.

The NOAEL for reproductive and developmental toxicity was considered to be 300 mg/kg bw/day for males and 120 mg/kg bw/day for females and their litters.

The results are consistent with similar findings in tests with tetrahydrofurfuryl alcohol (CAS no. 97-99-4), for which the Risk Assessment Committee of the EU has proposed a harmonized classification of Repro 1B and the Health phrase H360 (May damage the unborn child).

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Hunt". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Elizabeth Hunt
Task Force Administrator

From: (212) 303-7800
Tomoyuki Mase
Kowa American Corp.
55E 59th Street 19th Floor

New York, NY 10022

Origin ID: JRBA



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US Environmental Protection Agency
1201 Constitution Avenue, NW

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